

## DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

### **MEMORANDUM**

Date: July 16, 2001

To: All Class I, II, and III Facilities

From: Len Ashack, Chief  
Compliance Branch, OWQ

Subject: Monitoring and reporting during wet weather biosolids wash out events

Many wastewater treatment facilities experience increased flows during rain events due to varying degrees of infiltration and inflow of stormwater into sewer systems. In some cases, these increased flows can be so severe as to cause mixed liquor solids to wash out over secondary clarifier weirs. These washed out solids can clog rapid sand filters, can be deposited in polishing ponds, or can be discharged to the receiving streams. In addition to the requirement that the operator take all reasonable steps to prevent or minimize the wash out of solids to receiving streams, additional monitoring and reporting requirements may also apply. The following guidelines are intended to clarify these monitoring and reporting requirements:

1. NPDES Permits require representative sampling of the effluent. Samples and measurements taken as required shall be representative of the volume and nature of the monitored discharge. Any time the operator becomes aware of, or has reason to believe that there are significant changes in effluent quality, as happens when wash outs occur, sampling must immediately begin, and continue for the duration of the event. Such representative sampling is required even if the event occurs during a day or time when samples are not normally collected. For example: If sampling normally occurs Wednesday through Friday and it rains on Monday, then samples should be taken on Monday. -The facility would then include this sample with the samples taken on W-F (although only sampling on two of those days would then be mandatory).
2. In accordance with 327 IAC 5-2-8(3), permittees are required to take all reasonable steps to minimize any adverse impact to waters of the State resulting from noncompliance with any effluent limitations specified in their NPDES Permit. This requirement includes such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. Analytical results from the above-described representative sampling shall be used to determine the nature and impact of any discharge, which significantly violates NPDES Permit Parameters. Mitigation of adverse impact may include the physical removal of sludge solids deposited in the receiving stream.

3. The results of any additional monitoring must also be included in the Monthly Report of Operations (MRO) and the data must be used in the calculation of values reported on the Discharge Monitoring Report (DMR).
4. Unanticipated bypassing of tertiary treatment units, for example rapid sand filters or polishing ponds, due to hydraulic and/or solids over-loading must be reported orally or via the Bypass/Overflow Incident Report fax form within 24 hours of the event. If reported orally, a written report must be submitted within 5 days. Representative sampling of effluent must commence immediately when such bypassing occurs as outlined in #1 above.
5. In addition, NPDES Permits require that any discharge of pollutants to waters of the State which results in damage, acute injury, or death to any humans, animals, or aquatic life, be reported as soon as possible, but within two hours after the permittee becomes aware, of it. This includes any discharge regardless of whether or not it is authorized by the Permit (e.g. sanitary sewer overflows from lift stations or manholes). These occurrences are to be reported to IDEM's Emergency Response Section at 317-233-7745 or 888-233-7745 (toll free in Indiana).

To assure timely, and comprehensive compliance with the above requirements, it is also recommended that all facilities, especially those which experience periodic, rain-induced wash outs or excessive flows, develop a written protocol for coordination of activities, which can be implemented during such events. The protocol should be included in the Facility Operation and Maintenance Plan. Questions regarding this matter may be directed to Don Daily, Chief, Compliance Evaluation Section at [ddaily@dem.state.in.us](mailto:ddaily@dem.state.in.us) or 317/232-8636.